September 15, 1999

Mr. Lester Snow Executive Director CALFED Bay-Delta Program 1416 Ninth Street Sacramento, CA 95814

Re: CALFED Revised Phase II Report

Dear Mr. Snow:

The following comments are submitted on behalf of Kanawha Water District regarding the CALFED Revised Phase II Report. The district is located in Glenn County in Northern California. We are served water from the 114 mile long Tehama-Colusa Canal, a part of the Central Valley Project.

It is critical that CALFED strikes a balance between all of the competing water needs of California. The CALFED objective must be to provide this balance while maintaining a healthy environment. In an effort to achieve this balance the following issues must be recognized.

• Water Rights: The CALFED program must adhere to California's water rights priority system. The areas and watersheds of origin laws must be recognized. In addition, Cental Valley Project Improvement Act and other agreements for water contributions from Central Valley Project Contracts to meet Bay-Delta Water Standards within the areas of origin must be acknowledged as our contribution. Additional water requirements must originate from individuals outside of the areas of origin.

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- Groundwater: Groundwater in the Sacramento Valley should not be viewed as the water supply of the future. The groundwater condition varies widely from one area to another and must be analyzed in detail prior to a formal groundwater program being undertaken. For example, Kanawha Water District is on the west side of the Sacramento Valley and has a very limited groundwater resource and must rely on Central Valley Project water.
- New Storage: The time has come to stop studying new water storage facilities and start construction. These facilities must be constructed as soon as possible to meet the needs of the state's growing population and desire to maintain a healthy environment. North State Storage is a critical component of a new water storage program that will help meet current and future water needs for all uses. However, the cost of new water supply and storage facilities must be borne by those benefiting from the facilities. Kanawha Water District is entitled to the water held under contract with the Bureau of Reclamation and is protected by area of origin rights. Therefore, the district should not be required to share in any construction or related costs of new water storage.
- Land Acquisition: Land acquisition must be limited in Northern California because of the devastating effects it will have on the local economy. The program should focus on acquisition of less productive lands in other areas. Northern California Lands provide an irreplaceable habitat that should be protected.
- Water Acquisitions: Water acquisitions through land fallowing, groundwater substitution, land acquisitions and such in Northern California is not a viable solution for water supply for CALFED's Environmental Water Account. This water is already used to meet current needs.
- Fish Screen Funding: The Sacramento Valley has become the show case of the world with state-of-the-art fish screen projects. The program must be recognized and should receive a high priority for funding. This is probably the single most important program for water reliability and environmental protections.

• Good Science: The CALFED process must rely on good science and avoid a process that is driven by emotion. The decisions must be evaluated with the use of current data and realistic calculations of the economic impacts of such actions.

Thank you for this opportunity to comment on the CALFED Revised Phase II Report.

Sincerely yours,

Ronald Vickery

President, Kanawha Water District